

Exhibit B

In Re: Bard IVC Filters Products Liability

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE

BARD IVC FILTERS PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

VIDEOTAPED DEPOSITION OF DEBRA A. TINLIN

TAKEN AT: SPRINGHILL SUITES BY MARRIOTT

LOCATED AT: 1011 Tony Canadeo Run

Green Bay, Wisconsin

February 8, 2017

8:58 a.m. to 3:50 p.m.

REPORTED BY ANNICK M. JAQUET

REGISTERED MERIT REPORTER

CERTIFIED REALTIME REPORTER

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A P P E A R A N C E S:

LOPEZ MCHUGH, LLP, by
Mr. Joshua M. Mankoff
214 Flynn Avenue
Moorestown, New Jersey 08057-1767
(856) 273-8500
jmankoff@lopezmchugh.com
Appearing on behalf of the Plaintiff.

NELSON, MULLINS, RILEY & SCARBOROUGH, LLP, by
Ms. Brandee J. Kowalzyk
201 17th Street, NW #1700
Atlanta, Georgia 30363-1099
(404) 322-6000
brandee.kowalzyk@nelsonmullins.com
Appearing on behalf of the Defendant.

ALSO PRESENT: Andrew Gallun, videographer

I N D E X

Examination by:	Page:
Ms. Kowalzyk	6

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1 ER at that time?

2 A Pain in my back.

3 Q Okay. So can you describe the pain in your
4 back that you were experiencing that brought
5 you to the ER on May 4, 2005?

6 A Kind of a sharp pain in back of my lungs.

7 Q So is it your understanding that that pain was
8 a result of the pulmonary embolism?

9 A Yes.

10 Q And did -- did the doctors tell you that you
11 had developed additional clots even though you
12 had been on the Lovenox?

13 A Yes.

14 Q Prior to having the recovery filter placed in
15 you on May 7, 2005 had you ever heard of IVC
16 filters before?

17 A No.

18 Q Who was the first person to recommend that you
19 have a filter placed?

20 A I had a pulmonologist and a hematologist at the
21 time I was in the hospital and they were
22 together when they recommended it, and I do not
23 remember their names.

24 Q Did they tell you that they were recommending a
25 filter because you were at risk of an

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1 additional pulmonary embolism?

2 A Yes.

3 Q And did they tell you that the reason they
4 recommended a filter as an additional mechanism
5 to try to prevent the pulmonary embolism was
6 because you were -- you had developed the clots
7 even while on the blood thinning medication?

8 MR. MANKOFF: Object to form.

9 THE WITNESS: I believe that's what
10 they said, yes.

11 BY MS. KOWALZYK:

12 Q Did they talk about any other options for
13 treatment other than the filter at that time?

14 A They told me I would have to be on Coumadin for
15 the rest of my life.

16 Q And did they tell you if they were recommending
17 that you have a filter placed permanently or
18 temporarily?

19 A I don't remember anything about -- I thought it
20 was in there forever.

21 Q Did you understand that the recovery filter or
22 other inferior vena cava filters were a medical
23 device that could be retrieved if your doctors
24 determined it was no longer necessary?

25 A No.

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1 Q Do you have a calendar where you write down all
2 your appointments and stuff?

3 A We just have one of those erasable ones on the
4 refrigerator and, you know, every month if I
5 have one coming up I write it on there.

6 Q Got it. Have you ever talked to anyone at
7 Bard?

8 A No.

9 Q Other than your attorneys and your family have
10 you discussed your lawsuit with anybody else?

11 A No.

12 Q And I know that you have a Facebook page.

13 A I have a Facebook page, but I've never posted
14 anything on it.

15 Q Okay. Do you belong to Instagram or any of the
16 other social media?

17 A No. I have a Facebook page because my best
18 friend who lived next door for years moved to
19 Indiana and she does a lot of social media and
20 the only way I can see it is to have a Facebook
21 page to look at it.

22 Q Got it.

23 A That's the only reason I have a Facebook page.
24 She has posted two pictures on my Facebook
25 page, but I have never put anything on it.